

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NUMBER: 21-65
v. : MOTION TO MODIFY CONDITIONS OF
RELEASE
GREGORY FIOCCA :

Defendant Gregory Fiocca, by and through his undersigned counsel, hereby moves the Court to modify the terms of his Pretrial Release to eliminate the Home Incarceration term and instead to order Home Detention, permitting the defendant to work. In support of this motion defense counsel states:

1. The United States Pretrial Services Agency has advised that Mr. Fiocca has been compliant with the terms of bail previously set, and that it has no objection to this proposed modification and the proposed form of Order;
2. Assistant U.S. Attorney Costello has advised that the government consents to this modification and to the proposed form of Order;
3. The defendant has been confined to his home since being released from custody pursuant to the March 5, 2021 Order setting conditions of release without the ability to work; and

4. The defendant has gainful employment opportunities available to him, and the lack of income is affecting his family's financial condition negatively.

WHEREFORE, it is respectfully requested that the Court grant this motion. A proposed form of Order is being simultaneously submitted.

/s/ Rocco C. Cipparone, Jr.

Rocco C. Cipparone, Jr.
Attorney for Gregory Fiocca